

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Herold Marcel Devis		Chapter 13 Proceeding
	Debtor(s)	18-03273 JJT
WELLS FARGO BANK, N.A.	Movant	Hearing:
v. Herold Marcel Devis and Charles J. DeHart, III	Respondents	

OBJECTION TO CONFIRMATION OF PLAN

WELLS FARGO BANK, N.A. (Movant), a secured creditor in this case objects to the confirmation of the Debtor's Chapter 13 Plan and states the following:

1. The plan does not provide for the secured creditor, WELLS FARGO BANK, N.A., to receive the full value of its claim in violation of 11 U.S.C. §1325(a)(5)(B)(ii).
2. As of the date of the filing bankruptcy on August 3, 2018, Movant is the holder of a secured claim in the amount of \$244,995.55 secured by the Debtor's property located at 1330 Glade Dr, Long Pond, PA 18334. A copy of the Proof of Claim is attached hereto as Exhibit "A".
4. Debtor's plan proposes to pay movant arrears in the amount of \$18,000.00 rather than the correct amount of \$22,868.34. A copy of the Plan is attached hereto as Exhibit "B".
6. If the plan is confirmed, the Movant may suffer irreparable injury, loss and damage.

Respectfully Submitted,

/s/ Harry B. Reese, Esquire

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Attorney for Movant

Dated: September 6, 2018